

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CENTRAL LABORERS' PENSION FUND,	)	
<i>et al.</i> ,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 20 C 4175
	)	
MILBURN, L.L.C., an Illinois limited liability	)	JUDGE JOAN H. LEFKOW
company,	)	
	)	
Defendant.	)	

**JOINT STIPULATION OF VOLUNTARY DISMISSAL**

Plaintiffs, CENTRAL LABORERS' PENSION FUND, *et al.*, and Defendant, MILBURN, L.L.C., an Illinois limited liability company, by and through their attorneys, hereby stipulate and agree that all claims in the above-captioned litigation are voluntarily dismissed without prejudice and with leave to reinstate within thirty (30) days.

There remains due and owing from Defendant to Plaintiffs the amounts of \$448.34 for liquidated damages, \$1,856.05 for audit costs, \$330.00 for attorneys' fees and \$485.00 for court costs, for a total of \$3,119.39. The Defendant has offered and the Plaintiffs have agreed to accept approximately one-half of \$3,119.39, or \$1,500.00, in full satisfaction of the amounts due and owing to resolve this litigation. On October 9, 2020, Plaintiffs received check no. 10958 in the amount of \$1,500.00. Plaintiffs may reinstate this action on or before November 5, 2020 in the event the settlement check in the amount of \$1,500.00 fails to clear the bank. The parties respectfully request that this Court enter their proposed Order of Dismissal without prejudice.

CENTRAL LABORERS' PENSION FUND,  
*et al.*

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MILBURN, L.L.C.

/s/ Joe Milburn  
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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Joint Stipulation of Voluntary Dismissal) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 9th day of October 2020:

Mr. Joe Milburn  
In-House Counsel  
Milburn, L.L.C.  
620 28th Avenue  
Bellwood, IL 60104-1901

/s/ Cecilia M. Scanlon \_\_\_\_\_

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